

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED THERAPEUTICS)
CORPORATION,)
)
Plaintiff,)
)
v.) C.A. No. 23-975-RGA-SRF
)
LIQUIDIA TECHNOLOGIES, INC.,)
)
Defendant.)

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Plaintiff United Therapeutics Corporation and Defendant Liquidia Technologies, Inc. respectfully move this Court to schedule a teleconference to address some additional outstanding disputes regarding the following discovery matters:

- **Liquidia's refusal to produce financial documentation responsive to UTC's Requests for Production Nos. 11-15**
- **Liquidia's request for a one month extension of the fact discovery deadline.**
- **UTC's refusal to collect documents from and provide a deposition of Dr. Rothblatt.**
- **UTC's refusal to respond to Interrogatories No. 4 and 5.**

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on October 1, 2024.

- Plaintiff:
Delaware Counsel: Michael J. Flynn (Morris, Nichols, Arnsht & Tunnell LLP)
Lead Counsel: Art Dykhuis and Katherine Pappas (McDermott, Will & Emery LLP)
- Defendant:
Delaware Counsel: Karen E. Keller (Shaw Keller LLP)
Lead Counsel: Robert Minn (Cooley LLP)

The parties respectfully request that these disputes be heard at the discovery conference currently set for October 24, 2024. *See* D.I. 132.

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October 17, 2024